CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being transmitted to Examiner Jacob F. Betit via the USPTO EFS-Web on **August 29, 2006**.

Jinny Nguyen

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:	Date: August 29, 2006
Tanya COUCH, et al.	Confirmation No. 6531
Serial No: 10/037,659	Group Art Unit: 2164
Filed: January 2, 2002	Examiner: Jacob F. BETIT

For: METHOD AND SYSTEM FOR CONVERTING MESSAGE DATA INTO RELATIONAL TABLE FORMAT

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF UNDER 37 C.F.R. § 41.41

Dear Sir or Madam:

Pursuant to 37 C.F.R. § 41.41, Appellant submits this Reply Brief in response to the Examiner's Answer mailed on June 29, 2006.

I. REAL PARTY IN INTEREST

A statement identifying the real party in interest is contained in the Appeal Brief.

II. RELATED APPEALS AND INTERFERENCES

A statement identifying the related appeals and interferences is contained in the Appeal Brief.

III. STATUS OF CLAIMS

A statement identifying the status of the claims is contained in the Appeal Brief.

IV. STATUS OF AMENDMENTS

A statement identifying the status of amendments is contained in the Appeal Brief.

V. SUMMARY OF CLAIMED SUBJECT MATTER

A summary of the claimed subject matter is contained in the Appeal Brief.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A statement identifying the grounds of rejection to be reviewed on appeal is contained in the Appeal Brief.

VII. RESPONSE TO EXAMINER'S ANSWER

Claim 1 recites:

> A method for converting messaging data into a relational table format in a database system, wherein the messaging data is within a messaging system, the method comprising the steps of:
>
> (a) providing a plurality of table formatting specifications;
>
> (b) utilizing the plurality of table formatting specifications to automatically build and store a table function in the database system;
>
> (c) invoking the table function from within the database system to access the messaging data; and

(d) converting the messaging data by the table function into specific data types according to the plurality of table formatting specifications, wherein the messaging data is transformed into the relational table format.

Thus, in claim 1, the "table function" is operable to "access the messaging data" as well as to "[convert] the messaging data . . . into specific data types according to the plurality of table formatting specifications, wherein the messaging data is transformed into the relational table format."

Drexler, in contrast, teaches using an "import program 40" to parse messages and a separate "association 60" to associate parsed strings with database fields and to save parsed strings to associated database fields, as shown in Figure 2 of Drexler. Therefore, neither the "import program 40" nor the "association 60" in Drexler can be construed as disclosing the "table function" recited in claim 1.

Accordingly, based at least on the above reasons, it is respectfully submitted that claim 1, and the claims that depend therefrom, are not anticipated by Drexler. Given that claims 27 and 53 each recites elements similar to those of claim 1, it is respectfully submitted that those claims, and the claims that depend therefrom, are not anticipated by Drexler for at least the same reasons.

Claim 2, which depends from claim 1, further recites:

The method of claim 1, wherein the table function invokes at least one messaging function within the database system.

The paragraph of Drexler cited by the Examiner as disclosing claim 2 states:

A check box 170 may enable automated data import by the association, and another input location 172 may include the time period between new email checks. Another space 180 shows the names of associations scheduled for automated email to database import. An association list 190 shows the name of the association being configured, and includes buttons enabling the user to add to

> the automated list 180 or delete from the automated list, as shown at 194 and 196, respectively.

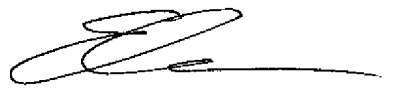
(Pg. 4, para. 0042 of Drexler). Hence, nothing in the cited passage relates to invocation of a messaging function.

Accordingly, based at least on the additional reasons above, it is respectfully submitted that claim 2, and the claims that depend therefrom, are further not anticipated by Drexler. Given that claims 28 and 54 each recites elements similar to those of claim 2, it is respectfully submitted that those claims, and the claims that depend therefrom, are further not anticipated by Drexler for at least the same reasons.

CONCLUSION

On the basis of the above remarks, and the remarks made in the Appeal Brief, Appellant respectfully submits that the final rejection should be reversed.

Respectfully submitted,
SAWYER LAW GROUP LLP



Dated: August 29, 2006

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VIII. APPENDIX OF CLAIMS

A listing of the claims involved on appeal is contained in the Appeal Brief.

IX. EVIDENCE APPENDIX

None

X. RELATED PROCEEDINGS APPENDIX

None